

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Docket No. 1:05-cr-10220-NMG-1

_____	)	
UNITED STATES OF AMERICA	)	
	)	MOTION TO CONTINUE THE PLEA
v.	)	AND SENTENCING HEARING
	)	
JAMES GOODWYN	)	
_____	)	

The defendant moves this court to continue the Rule 11 Plea Hearing, and Rule 32 Sentencing Hearing currently scheduled for June 29, 2006 for a period of at least one month. As reasons therefore, the defendant submits the following:

1. On April 19, 2006 the Honorable Judge Nathaniel M. Gorton allowed the defendant's motion for a pre-Rule 11 pre-sentence investigation.
2. On May 11, 2006 the probation department, the defendant, and counsel for the defendant pursuant to Federal Rule of Criminal Procedure 32 (c)(2) participated in a pre-sentence interview.
3. More time is necessary for the parties to request documents and comply with the required time standards of Rule 32.
4. Assistant United States Attorney Dana Gershengorn assents to this motion.

Counsel for the Defendant,

/s/ Joseph F. Krowski Jr.  
30 Cottage Street  
Brockton MA 02301  
508-584-2555

Dated: May 15, 2006

CERTIFICATE OF SERVICE

I hereby certify that on this 15<sup>th</sup> day of May, 2006, a copy of the Defendant's Motion to Continue the Plea and Sentencing Hearing was electronically mailed to:  
Assistant United States Attorney Dana Gershengorn, Office of the United States Attorney, United States Courthouse, 1 Courthouse Way, Boston MA 02210.

/s/ Joseph Krowski Jr.  
Joseph Krowski Jr.